Name of Listed Entity: Sai Capital Limited

Scrip Code/Name of Scrip/Class of Security: 531931

Share Holding Pattern Filed under: 31b Share Holding Pattern as on: 31-Mar-21

Declaration: The Listed entity is required to submit the following declaration to the extent of submission of information:-

S.No.	Particulars	Yes/ No	Remarks
1	Whether the Listed Entity has issued any partly paid up shares?	No	
2	Whether the Listed Entity has issued any Convertible Securities?	No	
3	Whether the Listed Entity has issued any Warrants?	No	
4	Whether the Listed Entity has any shares against which depository receipts are issued?	No	
5	Whether the Listed Entity has any shares in locked-in?	No	
6	Whether any shares held by promoters are pledge or otherwise encumbered?	Yes	Promoter/ Promoter Group
7	Whether the Listed Entity has issued any differential Voting Rights?	No	
8	Whether the listed entity has any significant beneficial owner?	Yes	

	Table I - Summary Statement holding of specified securities																	
Category	Category of shareholder (II)	Nos. of shareholders (III)	No. of fully paid up	No. of Partly paid-up	No. of shares underlying	Total nos.	Shareholding as a % of total no. of shares (calculated as per		sec	ghts held in urities (IX)	each class of	No. of Shares Underlying Outstanding convertible	Shareholding , as a % assuming full conversion of convertible securities (in shares	Number of Shares pledged or otherwise encumbered (XIII)		Number of equity
(I)			equity shares held	equity shares	Depository Receipts	(VII) = (IV)+(V)+ (VI)	SCRR, 1957)	No of	No of Voting Rights securities as a percentage of						As a % of	As a		dematerialized form (XIV)
			(IV)	held (V)	(VI)		As a % of (A+B+C2)	Class eg: X	Class eg:y	Total	Total as a % of (A+B+ C)	Warrants) (X)	(XI)= (VII)+(X) As a % of (A+B+C2)	No.	total Shares held (b)	No. (a) % of total Share s held (b)	(,	
(A)	Promoter & Promoter Group	6	2122700	0	0	2122700	73.723	2122700	0	2122700	73.723	0	73.723	0	0.000	1468444	69.178	1796200
(B)	Public	986	756600	0	0	756600	26.277	756600	0	756600	26.277	0	26.277	0	0.000	NA	NA	178400
(C)	Non Promoter- Non Public	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	NA	NA	0
(C1)	Shares underlying DRs	0	0	0	0	0	NA	0	0	0	0.000	0	0.000	0	0.000	NA	NA	0
(C2)	Shares held by Employee Trusts	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	NA	NA	0
	Total	992	2879300	0	0	2879300	100.000	2879300	0	2879300	100.000	0	100.000	0	0.000	1468444	51.000	1974600

				Table	II - Statement sl	nowing shareho	lding pattern of the	Promoter a	nd Promote	er Group								
			No. of fully	Partly paid-up	Nos. of shares underlying Depository Receipts (VI)	Total nos.	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) (VIII)	Number of	sec	ghts held in ea urities IX)	ach class of	No. of Shares Underlying Outstanding	Shareholding, as a % assuming full conversion of convertible	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity
S. No.	Category & Name of the Shareholders (I)	No. of shareholder (III)	paid up equity shares held (IV)	equity shares held (V)		shares held (VII = IV+V+VI)		No Class X	of Voting R	Total	Total as a % of Total Voting rights	convertible securities (including Warrants) (X)	securities (as a percentage of diluted share capital) (XI) = (VII)+(X) as a % of A+B+C2	No. (a)	As a % of total Shar es held (b)	No. (a)	As a % of total Shar es held (b)	shares held in dematerialized form (XIV)
(1)	Indian																	
(a)	Individuals/Hindu Undivided Family	2	155700	0	0	155700	5.408	155700	0	155700	5.408	0	5.408	0	0.000	0	0.000	155700
	NIRAJ KUMAR SINGH	1	138600	0	0	138600	4.814	138600	0	138600	4.814	0	4.814	0	0.000	0	0.000	138600
	JUHI SINGH	1	17100	0	0	17100	0.594	17100	0	17100	0.594	0	0.594	0	0.000	0	0.000	17100
(b)	Central Government/State Government(s)	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	0	0.000	0
(c)	Financial Institutions/Banks	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	0	0.000	0
(d)	Any Others (specify) # BODY CORPORATES	3	1640500	0	0	1640500	56.976	1640500	0	1640500	56.976	0	56.976	0	0.000	1468444	69.178	1640500
	SAI ENTERPRISES PVT LTD	1	361100	0	0	361100	12.541	361100	0	361100	12.541	0	12.541	0	0.000	335300	92.855	361100
	SAI BUSINESS AND CONSULTANCY SYSTEMS PVT LTD	1	362600	0	0	362600	12.593	362600	0	362600	12.593	0	12.593	0	0.000	336900	92.912	362600
	SAI AGENCIES PVT LTD	1	916800	0	0	916800	31.841	916800	0	916800	31.841	0	31.841	0	0.000	796244	86.850	916800
(f)	Any Others (specify)	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	0	0.000	0
	Sub-Total(A)(1)	5	1796200	0	0	1796200	62.383	1796200	0	1796200	62.383	0	62.383	0	0.000	0	0.000	1796200
(2)	Foreign	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	0	0.000	0
(a)	Individuals (Non- Resident Individuals/ Foreign Individuals)	1	326500	0	0	326500	11.340	326500	0	326500	11.340	0	11.340	0	0.000	0	0.000	0
	SANJIV ASTHANA	1	326500	0	0	326500	11.340	326500	0	326500	11.340	0	11.340	0	0.000	0	0.000	0
(b)	Government	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	0	0.000	0
(c)	Institutions	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	0	0.000	0
(d)	Foreign Portfolio Investor	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	0	0.000	0
	Sub-Total (A)(2)	1	326500	0	0	326500	11.340	326500	0	326500	11.340	0	11.340	0	0.000	0	0.000	0
	Total Shareholding of Promoter and Promoter Group (A)= (A)(1)+(A)(2)	6	2122700	0	0	2122700	73.723	2122700	0	2122700	73.723	0	73.723	0	0.000	1468444	69.178	1796200

^{3,26,500} Shares out of total Promoter Shareholding of 21,22,700 Shares held by Mr. Sanjiv Asthana (Foreign Promoter Shareholding is listed under the Foreign Category.

The entire balance Domestic Promoter Shareholding of 17,96,200 Shares is held in Dematerialized Form.

	Table III - Statement showing shareholding pattern of the Public Shareholder																	
				Partly	Nos. of shares		Shareholding %	Number o	sec	ghts held in ea urities IX)	ach class of	No. of Shares Underlying	Total Shareholding, as a % assuming full	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered(XIII)		Number of equity
S. No.	Category & Name of the Shareholders	No. of shareholder	No. of fully paid up equity	paid-up equity	underlying Depository Receipts (VI)	Total nos. shares held (VII = IV+V+VI)	calculated as per SCRR, 1957 As a % of (A+B+C2) (VIII)	No	No of Voting Rights			Outstanding convertible	conversion of convertible				As a	shares held in
3.110.	(1)	(III)	shares held (IV)	shares held (V)				Class X	ClassY	Total	Total as a % of Total Voting rights	securities (including Warrants) (X)	securities (as a percentage of diluted share capital) (XI)	No. (a)	As a % of total Shar es held (b)	No. (a)	% of total Shar es held (Not applicabl e)(b)	dematerialized form (XIV)
(1)	Institutions																	
(a)	Mutual Fund	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	NA	NA	0
(b)	Venture Capital Funds	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	NA	NA	0
(c)	Alternate investment Funds	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	NA	NA	0
(d)	Foreign Venture Capital Investors	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	NA	NA	0
(e)	Foreign Portfolio Investors	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	NA	NA	0
(f)	Financial Institutions/ Banks	1	84300	0	0	84300	2.928	84300	0	84300	2.928	0	2.928	0	0.000	NA	NA	84300
	UNION BANK OF INDIA	1	84300	0	0	84300	2.928	84300	0	84300	2.928	0	2.928	0	0.000	NA	NA	84300
(g)	Insurance Companies	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	NA	NA	0
(h)	Provident Funds/ Pension Funds	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	NA	NA	0
(i)	Any Others (specify)	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	NA	NA	0
	Sub-Total(B)(1)	1	84300	0	0	84300	2.928	84300	0	84300	2.928	0	2.928	0	0.000	NA	NA	84300
(2)	Central Government/ State Government(s)/ President of India	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	NA	NA	0
	Sub-Total (B)(2)	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	NA	NA	0
(3)	Non-institutions	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	NA	NA	0
(a)	Individuals -i. Individual shareholders holding nominal share capital up to Rs. 2 lakhs.	974	561746	0	0	561746	19.510	561746	0	561746	19.510	0	19.510	0	0.000	NA	NA	4046
(a)	ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.	3	86954	0	0	86954	3.020	86954	0	86954	3.020	0	3.020	0	0.000	NA	NA	86954
	MAHENDRA KUMAR PANDEY	1	29900	0	0	29900	1.038	29900	0	29900	1.038	0	1.038	0	0.000	NA	NA	29900
	KAILASH CHANDRA SHARMA	1	29400	0	0	29400	1.021	29400	0	29400	1.021	0	1.021	0	0.000	NA	NA	29400
(b)	NBFCs registered with RBI	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	NA	NA	0
(c)	Employee Trusts	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	NA	NA	0
(d)	Overseas Depositories (holding DRs) (balancing figure)	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	NA	NA	0
(e)	Any Other (specify) # CORPORATE BODY	2	3900	0	0	3900	0.135	3900	0	3900	0.135	0	0.135	0	0.000	NA	NA	3100
(f)	Any Other (specify) # NRI	6	19700	0	0	19700	0.684	19700	0	19700	0.684	0	0.684		0.000	NA	NA	0
	Sub-Total (B)(3)	985	672300	0	0	672300	23.349	672300	0	672300	23.349	0	23.349	0	0.000	NA	NA	94100
	Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3)	986	756600	0	0	756600	26.277	756600	0	756600	26.277	0	26.277	0	0.000	NA	NA	178400

	Table IV - Statement showing shareholding pattern of the Non Promoter - Non Public Shareholder																	
			No. of fully	Partly paid-up	Nos. of shares	Total nos.	Shareholding % calculated as per		sec	ghts held in e urities IX)	each class of	No. of Shares Underlying Outstanding	Total Shareholding, as a % assuming full conversion of	Number of L share (XII	es	Number of Shares pledged or otherwi encumbered(XIII)		Number of equity
	Category & Name of the Shareholders (I)	No. of shareholder (III)	paid up equity	equity	underlying Depository	shares held	SCRR, 1957	No	of Voting R	ights		convertible	convertible	As a		1 ** *	As a	shares held in dematerialized form (XIV)
			shares held (IV)	shares held (V)	S Descints	(VII = IV+V+VI)	As a % of (A+B+C2) (VIII)	Class X	ClassY	Total	Total as a % of Total Voting rights	securities (including Warrants) (X)	securities (as a percentage of diluted share capital) (XI)	No. (a)	% of			
(1)	Custodian/DR Holder	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000		0.000	NA	NA	0
(2)	Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014)	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	NA	NA	0
	Total Non-Promoter-Non-Public Shareholding (C)= (C)(1)+(C)(2)	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	0.000	NA	NA	0

Table V- Statement showing details of significant beneficial owners (SBOs)

	Details of the	SBO	Details of the registe		Who	Date of creation / acquisition of				
S.No.	Name	Nationality	Name	Nationality	Shares %	Voting Rights %	Dividend Rights %	Exercise of Control	Exercise of Significant Influence	significant beneficial interest
1	Niraj Kumar Singh	Indian	Sai Enterprises Private Limited	Indian	12.54	12.54	12.54	Yes	Yes	13-07-1996
2	Niraj Kumar Singh	Indian	Sai Business and Consultancy Systems Private Limited	Indian	12.59	12.59	12.59	Yes	Yes	13-07-1996
3	Niraj Kumar Singh	Indian	Sai Agencies Private Limited	Indian	31.84	31.84	31.84	Yes	Yes	13-07-1996